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FILED

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Clerk, U.S. District Court
District Of Montana
Billings

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ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

UNITED STATES OF AMERICA,	CR 19-30-M-DWM
Plaintiff,	SUPERSEDING INDICTMENT
vs.	INTERSTATE STALKING Title 18 U.S.C. § 2261A(2)(B) (Counts I-X) (Penalty: Five years imprisonment, \$250,000 fine, and three years supervised release)
BRYAN GREGG WATERFIELD NASH,	INTERSTATE COMMUNICATION WITH INTENT TO EXTORT Title 18 U.S.C. § 875(d) (Count XI) (Penalty: Two years imprisonment, \$250,000 fine, and one year supervised release)
Defendant.	

THE GRAND JURY CHARGES:

COUNT I

That beginning in approximately December 2013, and continuing until
approximately June 2019, at Whitefish, in Flathead County, in the State and

District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate John Doe 1 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to John Doe 1, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT II

That beginning on or about October 6, 2016, and continuing until on or about June 23, 2019, at Whitefish, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate Jane Doe 1 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be

reasonably expected to cause, substantial emotional distress to Jane Doe 1, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT III

That beginning on or about November 4, 2016, and continuing until on or about June 6, 2019, at Whitefish, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate John Doe 2 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to John Doe 2, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT IV

That beginning on or about November 22, 2018, and continuing until on or about April 24, 2019, at Whitefish, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate Jane Doe 2 (full name withheld to protect privacy), used an interactive

computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Jane Doe 2, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT V

That beginning on or about November 23, 2018, and continuing until on or about April 11, 2019, at Whitefish, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate John Doe 3 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to John Doe 3, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT VI

That on or about March 28, 2019, at Whitefish, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate John Doe 4 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to John Doe 4, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT VII

That beginning on or about April 18, 2019, and continuing until on or about June 5, 2019, at Whitefish, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate Jane Doe 3 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to

engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Jane Doe 3, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT VIII

That on or about June 28, 2018, at Kalispell, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate John Doe 5 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to John Doe 5, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT IX

That beginning on or about March 10, 2019, and continuing until on or about June 15, 2019, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate Jane Doe 4 (full name withheld to protect privacy), used an interactive computer service,

electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Jane Doe 4, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT X

That on or about September 11, 2018, at Kalispell, in Flathead County, in the State and District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to harass and intimidate Jane Doe 5 (full name withheld to protect privacy), used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely a computer, cellular telephone, e-mail and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Jane Doe 5, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT XI

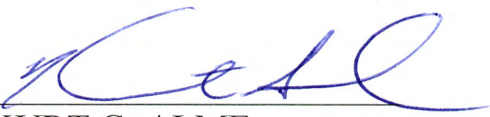
That beginning in approximately December 2013, and continuing until approximately June 2019, at Whitefish, in Flathead County, in the State and

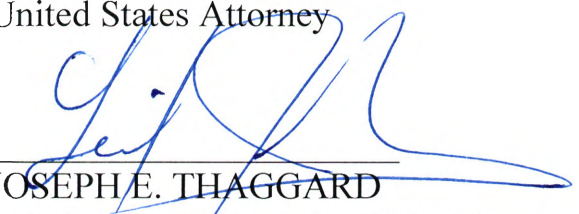
District of Montana, and elsewhere, including the Northern District of California, the defendant, BRYAN GREGG WATERFIELD NASH, with the intent to extort money and things of value from John Doe 1, knowingly transmitted in interstate commerce electronic messages that contained a true threat to injure the reputation of John Doe 1, that is, the defendant threatened to release information to law enforcement and the media regarding alleged behavior and violations of the laws of the United States by John Doe 1 if John Doe 1 refused to pay the defendant substantial sums of money, in violation of 18 U.S.C. § 875(d).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON


KURT G. ALME
United States Attorney

fd

JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons ☒ 12/10/2019 @ 10:30 am
Warrant: _____
Bail: _____
KLD-11512